

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
YUETING JIA,<sup>1</sup> )  
Debtor. ) Case No. 19-12220 (KBO)

**INTERPRETER-TRANSLATOR DECLARATION OF SHAN HE  
RE: CERTAIN CREDITORS' LETTERS IN OPPOSITION TO THE MOTION  
(I) TO DISMISS THE DEBTOR'S CHAPTER 11 CASE OR, ALTERNATIVELY,  
(II) TO TRANSFER VENUE TO THE CENTRAL DISTRICT OF CALIFORNIA**

I, Shan He, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am a Chinese translator, simultaneous interpreter and localization project manager employed since April 2017 by (a) Yueling Jia, the debtor and debtor in possession (the “Debtor”), that has filed a voluntary petition under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) commencing the above-captioned bankruptcy case (the “Chapter 11 Case”), and (b) Faraday Future (“Faraday”), an entity in which the Debtor holds an indirect interest.

2. I am a native speaker of Chinese (Mandarin) and maintain full professional fluency in English. I hold a Bachelor of Science degree in English from Beijing Language and Culture University and a Master of Arts in Translation and Interpretation (Chinese – English) degree from the Monterey Institute of International Studies (“MIIS”). I am certified in Simultaneous and Consecutive Interpretation between English and Chinese by MIIS. I currently provide translation services for the Debtor and his General Counsel. Prior to my work

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8972. The Debtor's mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

with the Debtor and Faraday, I have provided interpretation and translation services for a variety of organizations, including the United Nations Institute for Training & Research (UNITAR), Syntes Language Group, and the Austrian Embassy.

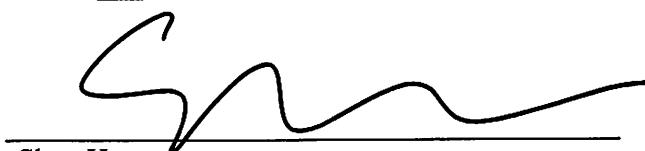
3. I submit this declaration regarding the following letters of creditors received by the Debtor in Opposition to the Motion (I) to Dismiss the Debtor's Chapter 11 Case or, Alternatively, (II) to Transfer Venue to the Central District of California (the "Letters"):

- a) Wuxi Pule Investment Ltd
- b) Wuxi Leyike Investment Ltd
- c) Jiaxing Haiwen Investment Partnership

4. I have reviewed and translated the Letters into English. To the best of my knowledge, my translation accurately reflects the contents and meaning of the Letters. True and correct copies of the Letters and my translations are attached hereto as Exhibit A.

I declare under penalty of perjury under the United States of America that the foregoing is true and correct.

Executed this 17 day of December 2019 at Gardena, California.



Shan He

**ORIGINAL**

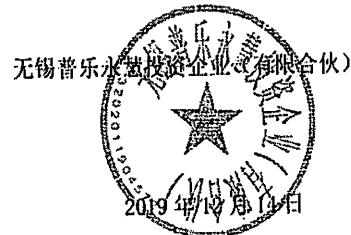
尊敬的贾先生：

我方是在您的破产案件中主张大约为 8783216 美元索赔的债权人。

我方撰写此函旨在反对上海懒财资产管理有限公司于 2019 年 11 月 13 日向破产法庭提交的（一）驳回债务人第十一章案，或者（二）将地点移交至加利福尼亚州中区之动议。

我方认为，所有债权人应享有充分、公平的考虑您重组计划的机会，我方支持您在说服破产法院受理此案中所作出的努力。此外，我方认为此案必须尽快推进，因此，我方认为动议中所提出的将此案从特拉华州移交至加利福尼亚州并无任何益处。

如果在此方面还需要任何其他帮助，请随时与我方联系。



**TRANSLATION**

Dear Mr. Jia:

We are a creditor asserting a claim in your bankruptcy case in the approximate amount of US\$8,783,216.

We write in response and opposition to Shanghai Lan Cai Asset Management Co, Ltd.'s Motion (I) to Dismiss the Debtor's Chapter 11 Case or, Alternatively, (II) to Transfer Venue to the Central District of California, filed with the Bankruptcy Court on November 13, 2019. We believe that all creditors should be given a full and fair opportunity to consider your plan of reorganization and support your efforts to persuade the Bankruptcy Court not to dismiss the case. Also, since we believe that this case must proceed as expeditiously as possible, we see no benefit whatsoever to transferring the case from Delaware to California, as is requested in the motion.

Please do not hesitate to contact us if we may be of additional assistance in this effort.

Wuxi Pule Investment Ltd

[Signature]

December 14, 2019

**ORIGINAL**

尊敬的贾先生：

我方是在您的破产案件中主张大约为 11450829 美元索赔的债权人。

我方撰写此函旨在反对上海懒财资产管理有限公司于 2019 年 11 月 13 日向破产法庭提交的（一）驳回债务人第十一章案，或者（二）将地点移交至加利福尼亚州中区之动议。

我方认为，所有债权人应享有充分、公平的考虑您重组计划的机会，我方支持您在说服破产法院受理此案中所作出的努力。此外，我方认为此案必须尽快推进，因此，我方认为动议中所提出的将此案从特拉华州移交至加利福尼亚州并无任何益处。

如果在此方面还需要任何其他帮助，请随时与我方联系。

无锡乐翼可电动汽车投资企业（有限合伙）

2019 年 12 月 14 日

**TRANSLATION**

Dear Mr. Jia:

We are a creditor asserting a claim in your bankruptcy case in the approximate amount of US\$11,450,829.

We write in response and opposition to Shanghai Lan Cai Asset Management Co, Ltd.'s Motion (I) to Dismiss the Debtor's Chapter 11 Case or, Alternatively, (II) to Transfer Venue to the Central District of California, filed with the Bankruptcy Court on November 13, 2019. We believe that all creditors should be given a full and fair opportunity to consider your plan of reorganization and support your efforts to persuade the Bankruptcy Court not to dismiss the case. Also, since we believe that this case must proceed as expeditiously as possible, we see no benefit whatsoever to transferring the case from Delaware to California, as is requested in the motion.

Please do not hesitate to contact us if we may be of additional assistance in this effort.

Wuxi Leyike Investment Ltd

[Signature]

December 14, 2019

**ORIGINAL**

尊敬的贾先生：

我方是在您的破产案件中主张大约为 壹拾伍万 美元索赔的债权人。

我方撰写此函旨在反对上海懒财资产管理有限公司于 2019 年 11 月 13 日向破产法庭提交的（一）驳回债务人第十一章案，或者（二）将地点移交至加利福尼亚洲中区之动议。我方认为，所有债权人应享有充分、公平的考虑您重组计划的机会，我方支持您在说服破产法院审理此案中所作出的努力。此外，我方认为此案必须尽快推进，因此，我们认为动议中所提出的将此案从特拉华州移交至加利福尼亚洲并无任何益处。

如果在此方面还需要任何其他帮助，请随时与我方联系。



**TRANSLATION**

Dear Mr. Jia:

We are a creditor asserting a claim in your bankruptcy case in the approximate amount of US\$250,000.

We write in response and opposition to Shanghai Lan Cai Asset Management Co, Ltd.'s Motion (I) to Dismiss the Debtor's Chapter 11 Case or, Alternatively, (II) to Transfer Venue to the Central District of California, filed with the Bankruptcy Court on November 13, 2019. We believe that all creditors should be given a full and fair opportunity to consider your plan of reorganization and support your efforts to persuade the Bankruptcy Court not to dismiss the case. Also, since we believe that this case must proceed as expeditiously as possible, we see no benefit whatsoever to transferring the case from Delaware to California, as is requested in the motion.

Please do not hesitate to contact us if we may be of additional assistance in this effort.

Jiaxing Haiwen Investment Partnership

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